

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**DEFENDANTS' MOTION FOR PROTECTIVE ORDER
TEMPORARILY STAYING DISCOVERY RESPONSES**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel, pursuant to Fed. R. Civ. P. 26(c) and Local Rule 7 hereby move for a Protective Order temporarily staying Defendants' discovery responses until ten (10) days after the Court issues a ruling on Defendants' pending Motion to Dismiss. The grounds for this requested relief are set forth in a contemporaneously filed Memorandum in Support. A proposed Order is attached.

Local Rule 37(E) Certification

Defendants' counsel attempted to confer in good faith with counsel for Plaintiffs regarding this Motion but counsel were unable to reach agreement.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

Michael S. Dingman (VSB No. 30031)

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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